



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP
F. #2021R00600

271 Cadman Plaza East
Brooklyn, New York 11201

October 15, 2024

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By Email and ECF

Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were obtained by the government during the course of the investigation:

Bates No.	Description of Item
EDNY_009881-EDNY_011267	Photographs from Search of the Sun and Hu Residence

Bates No.	Description of Item
EDNY_011268-EDNY_011294	Photographs from Search of the TD Bank Safe Deposit Box
EDNY_011295-EDNY_011593	Photographs from the Search of the Entity Identified in the Indictment as the Liquor Store
EDNY_011594-EDNY_011598	Evidence Collected Item Log from the Search of the Sun and Hu Residence

In addition, please find the following materials produced in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which are contained on encrypted hard drives produced separately to counsel for the respective defendant. The passwords will be sent by separate cover.

Please find the following enclosed for counsel for Linda Sun:

Bates No.	Description of Item
SUN_000002	Records Associated with the iCloud Account [REDACTED] (2022)
SUN_000003	Records Associated with the iCloud Account [REDACTED] (2024)

Please find the following enclosed for counsel for Chris Hu:

Bates No.	Description of Item
HU_000002	Records Associated with the iCloud Account [REDACTED] (Feb 2024)
HU_000003	Records Associated with the iCloud Account [REDACTED] (May 2024)
HU_000004	Records Associated with the iCloud Account [REDACTED] (May 2024)

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Alexander A. Solomon
Alexander A. Solomon
Robert M. Pollack
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (BMC) (by ECF) (without download link)